



May 7, 2003

Janet Snyder Matthews, Ph.D.,  
State Historic Preservation Officer  
Division of Historical Resources  
R. A. Gray Building, Room 305  
500 South Bronough Street  
Tallahassee, FL 32399-0250

**Attn:** Alissa Slade  
Historic Sites Specialist

**Subject:** DHR No. 2003-1737

**Revised Report: *Cultural Resources Assessment, Village of Islamorada Plantation Key/North Plantation Key Wastewater Treatment Plant, Florida Keys, Florida.***

Dear Dr. Mathews:

On behalf of the Federal Emergency Management Agency (FEMA) Region IV, URS Group, Inc., submits one copy of the revised report, *Cultural Resources Assessment, Village of Islamorada Plantation Key/North Plantation Key Wastewater Treatment Plant, Florida Keys, Florida*, for your review. The purpose of this assessment is to assist FEMA's project planning regarding the proposed wastewater treatment plant on Conch Key, to ensure compliance with the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (NHPA) of 1966, and to provide the Florida State Historic Preservation Office (SHPO) with information on possible impacts to cultural resources.


This assessment was completed in August 2002 by URS Group, Inc., and a report was submitted to your office on February 27, 2003. In its response letter dated March 13, 2003, your staff had determined that the report was complete but requested additional information. The enclosed revised report addresses these comments. The report has been prepared in accordance with applicable state and federal standards by investigators who meet *The Secretary of Interior's Professional Qualification Standards*, 36 CFR Part 61, in the discipline of archaeology.

URS Group, Inc.  
200 Orchard Ridge Drive, Suite 101  
Gaithersburg, MD 20878  
Tel: 301.258.9780  
Fax: 301.869.8728  
www.urscorp.com

We look forward to receiving your agency's comments on the revised report. If you or your staff have any questions, please contact me at 301-652-2215, ex. 228.

Sincerely,

**URS Group, Inc.**



Justin S. Patton  
Archaeologist

Enclosure

cc: Science Kilner, FEMA Region IV, Lead Environmental Specialist  
Steve Carruth, URS Group, Inc., Environmental Planner  
Ramon Mendieta, URS Group, Inc., Project Environmental Scientist



February 18, 2003

Mr. Jay Slack  
U.S. Fish and Wildlife Service  
South Florida Ecological Services Office  
1339 20<sup>th</sup> Street  
Vero Beach, Florida 32960-3559

**RE: NEPA Notice of Draft Supplemental Environmental Assessment (SEA); and  
ESA Section 7 Informal Consultation Request for the Plantation Key  
Colony/North Plantation Key Wastewater System, Monroe County, Florida**

Dear Mr. Slack:

The purpose of this letter is to provide your agency with notice that URS Group, Inc. (URS), on behalf of the Federal Emergency Management Agency (FEMA), is preparing a Draft Supplemental Environmental Assessment (SEA); pursuant to the National Environmental Policy Act; for the Plantation Key Colony/North Plantation Key Wastewater System, Monroe County, Florida. The Draft SEA evaluates three wastewater management alternatives proposed for Plantation Key Colony/North Plantation Key: No Action (Alternative 1); Centralized Wastewater Treatment Plant on Bayside (Alternative 2); and Centralized Wastewater Treatment Plant on Oceanside (Alternative 3). At this time, FEMA requests your concurrence with their findings of not likely to adversely effect in compliance with Section 7 of the Endangered Species Act and the Migratory Bird Treaty Act (MBTA) for the three alternatives under review.

FEMA is considering funding an application from the Village of Islamorada (Village) to construct a wastewater treatment system that would serve approximately 5,000 people on Plantation Key Colony/North Plantation Key in the Florida Keys. The purpose of the FKAA project is to reduce wastewater nutrient loading at selected Monroe County-identified "hot spots" to improve water quality; these "hot spots" are believed to contribute to water quality degradation. The Monroe County Sanitary Wastewater Master Plan ranked Plantation Key as the 19<sup>th</sup> most critical "hot spot" in the Florida Keys. The "hot spot" ranking is linked to the use of cesspools and septic systems as Plantation Key Colony/North Plantation Key's main wastewater treatment systems. FEMA would provide funding assistance to the Village as part of their effort to assist residents in Plantation Key Colony/North Plantation Key in meeting the Florida Statutory Treatment Standards of 2010 for wastewater effluent disposal to shallow wells. A description of the range of alternatives for the proposed wastewater treatment system as well as a street map of the project vicinity is attached.



Mr. Jay Slack  
U.S. Fish and Wildlife Service  
February 18, 2003  
Page 2 of 5

Lists of special status species with the potential to occur in Monroe County were obtained from "Threatened and Endangered Species Software (TESS), Version 2.0," and from the U.S. Fish and Wildlife Service (FWS) Threatened and Endangered Species Internet site.

On July 31, 2002, URS biologists Michael Breiner and Keith Stannard performed reconnaissance level field surveys at the sites of the proposed alternative sites. The purpose of these surveys, conducted concurrently with vegetation and wildlife investigations, was to investigate the potential presence of federally protected species and/or suitable habitat for these species in each of the proposed alternative sites. The following two alternative sites were investigated:

- **Plantation Key Preferred Site** - Wastewater Treatment Plant (WWTP) Preferred Site located on the west side (bay side) of US Highway 1 (US-1) at approximate MM 89.8 on Plantation Key; and
- **Plantation Key Alternate Site** - WWTP Alternate Site located on the east side (ocean side) of US-1 at approximate MM 89.75 on Plantation Key.

### **Preferred Site Description**

The Preferred Site is roughly L-shaped and approximately 0.8 acre in size. It is located along the west side of US-1, east of Gardenia Street and south of Woods Avenue. Existing vegetation at the Preferred Site can largely be characterized as a remnant hardwood hammock degraded by fragmentation and infestation by invasive, non-indigenous plant species.

Observed native species that are common canopy components at the site include false tamarind (*Lysiloma latisiliquum*), poisonwood (*Metopium toxiferum*), Jamaican dogwood (*Piscidia piscipula*), gumbo limbo (*Bursera simaruba*), and pigeon plum (*Coccoloba diversifolia*). In addition to smaller individuals of the canopy species, Spanish stopper (*Eugenia foetida*), snowberry (*Chiococca alba*), and redgal (*Morinda royoc*) are common understory species.

Exotic species such as Brazilian pepper (*Schinus terebinthifolius*) and Australian pine (*Casuarina equisetifolia*) have invaded this hardwood hammock community, with Brazilian pepper comprising the dominant canopy in the western and southern portions of the site. Australian pine is a dominant component of the canopy in the portions of the site adjacent to US-1. Three Florida thatch palm (*Thrinax radiata*) seedlings, listed by the

Mr. Jay Slack  
U.S. Fish and Wildlife Service  
February 18, 2003  
Page 3 of 5

State of Florida as Threatened, were noted in the southwestern portion of the site near Gardenia Street. A few individuals of West Indian mahogany (*Swietenia mahagoni*), state-listed as Endangered, were observed in the central and northern portions of the site. No jurisdictional wetlands or surface waters were identified at this site.

Between the site and Woods Avenue to the north are undeveloped forested parcels comprised of vegetation similar to that of the Preferred Site, although with a lesser occurrence of exotic vegetation (e.g., Brazilian pepper). Adjacent residences and undeveloped parcels are dominated by Brazilian pepper and Australian pine.

#### **Alternate Site Description**

The existing vegetative communities at the Alternate Site are also characteristic of a remnant hardwood hammock, but appear to be of a higher quality as evidenced by the minimal occurrence of exotic plant species within its interior. The Alternate Site is a rectangular area, slightly more than 1 acre in size, bounded by US-1 to the west and Old State Road 4A to the east, the intersection of Old State Road 4A and Plantation Shores Drive to the north, and High Street to the south. The site consists of a vegetative community characteristic of a tropical hardwood hammock with relatively little invasive, non-indigenous species infestation. Exotic plant intrusions, by Brazilian pepper and white leadtree (*Leucaena leucocephala*), are generally limited to roadside margins and the property immediately north of the site. Canopy vegetation at this site consists of hammock species such as West Indian mahogany, false tamarind, gumbo limbo, pigeon plum, poisonwood, and Jamaican dogwood. In addition to smaller individual species observed within the canopy stratum, important components of the understory include black ironwood (*Krugiodendron ferreum*), spanish stopper, white stopper (*Eugenia axillaris*), and lancewood (*Ocotea coriacea*), with snowberry common on the periphery.

A small population of barbed-wire cactus (*Acanthocereus tetragonus*), listed by the State of Florida as Threatened, exists within the west central portion of the site near US-1. Several large individuals of mahogany, a State-listed Endangered species, were observed, as well as a number of large individuals of gumbo limbo, strangler fig (*Ficus aurea*), and wild tamarind. No jurisdictional wetlands or surface waters were identified at this site.

#### **Wildlife Observations**

No special status wildlife species were observed in the proposed alternative sites. During the site investigations, Eurasian collared doves (*Streptopelia decaocto*) and Mourning

Mr. Jay Slack  
U.S. Fish and Wildlife Service  
February 18, 2003  
Page 4 of 5

doves (*Zenaida macroura*) were observed in the vicinity of the two alternative sites. Unidentified passerines were also heard calling or singing in the vicinity of the sites.

Brown anoles (*Anolis sagrei*) were observed at both sites. No other reptiles, amphibians, or mammals were observed during the investigation of the two sites.

Several land crab (*Cardisoma guanhumi*) burrows were observed at the Preferred site and four giant swallowtail butterflies (*Papilio cresphontes*) were observed in the vicinity of wild lime plants (*Zanthoxylum fagara*) at the Preferred site.

#### **Anticipated Impacts to Special Status Species**

Although several federally-listed species could potentially occur in this portion of the Florida Keys, no federally-listed threatened or endangered species were observed during field investigations at either site.

A few individuals of wild lime (*Zanthoxylum fagara*) were noted at each site. This species is sometimes utilized as a host plant by the Schaus' swallowtail butterfly (*Heraclides aristodemus ponceanus*), listed as Endangered at the state and federal levels (Hipes et al., 2001). The historic range of this species extended from South Miami southward to Lower Matecumbe Key, and included Plantation Key (FWS, 1999). However, the current known distribution of this butterfly is limited to Key Largo and islands within Biscayne Bay that support tropical hardwood hammocks (Hipes et al., 2001). It appears highly unlikely that this butterfly could migrate to the alternative sites due to the intervening presence of developed areas that lack suitable habitat conditions.

Additionally, due to its small size, proximity to US-1 and other developed areas and degraded habitat value due to exotic species invasion, the Preferred Site is not likely to provide significant nesting, roosting or foraging habitat for migratory birds or other transient species. The Alternate Site has experienced less habitat degradation than the Preferred Site and is adjacent to relatively large tracts of hardwood hammock, but is relatively small and bordered on three sides by developed land. Therefore, the Alternate Site may provide some foraging habitat for migratory birds and other transient species, but is unlikely to represent a significant resource for these species.

In an effort to minimize and help offset construction-related impacts to existing hammock habitat, portions of the site would be replanted with appropriate native species following



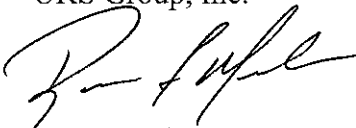
Mr. Jay Slack  
U.S. Fish and Wildlife Service  
February 18, 2003  
Page 5 of 5

construction. The Village has committed to utilizing no less than 75% native species in its landscaping plan, with the remaining 25% being drought tolerant.

Under the No Action Alternative (Alternative 1), no changes would be made to the existing wastewater systems. It is likely that the benefits associated with improved water quality would be delayed and continued degradation in water quality would continue in the short-term. Based on the results of the biological field visit, consultation with experts, and a review of special status species lists, FEMA finds that the proposed alternatives would not result in the take of federally listed threatened or endangered species or species protected under MBTA, jeopardize the continued existence of these species, or adversely affect their habitat. As part of the informal consultation process, FEMA respectfully seeks written concurrence on this determination of no effect within 30 days to the letterhead address. If you have any questions or comments, please do not hesitate to contact me at (305) 884-8900, or Ms. Science Kilner, FEMA Lead Environmental Specialist at (770) 220-5357. Thank you very much for your assistance.

Sincerely,

URS Group, Inc.

  
for Laura J. Cherney  
Environmental Scientist

Attachments as noted

cc: Phil Frank, U.S. Fish and Wildlife Service  
Science Kilner, FEMA Region IV, Lead Environmental Specialist  
Jon Randall, URS Group, Inc., Environmental Planner

#### References

Hipes, D., D. R. Jackson, K. NeSmith, D. Printiss, and K. Brandt. 2001. Field guide to the rare animals of Florida. Florida Natural Areas Inventory, Tallahassee.

U.S. Fish and Wildlife Service (FWS), 1999. South Florida Multi-Species Recovery Plan, Atlanta, Georgia.



# United States Department of the Interior

FISH AND WILDLIFE SERVICE  
South Florida Ecological Services Office  
1339 20<sup>th</sup> Street  
Vero Beach, Florida 32960



April 22, 2003

Laura J. Cherney  
URS Group, Incorporated  
700 South Royal Poinciana Boulevard, Suite 1000  
Miami Springs, Florida 33166

Service Log No.: 4-1-03-I-1008  
Dated: February 18, 2003  
Applicant: Federal Emergency  
Management Agency  
County: Monroe

Dear Ms. Cherney:

The Fish and Wildlife Service (Service) has reviewed plans, maps, and other information provided by the URS Group on behalf of the Federal Emergency Management Agency (FEMA) for the Draft Supplemental Environmental Assessment for the Plantation Key Colony/North Plantation Key Wastewater System. These comments are provided under the provisions of section 7 of the Endangered Species Act (ESA) of 1973, as amended (87 Stat. 884; 16 U.S.C. 1531 *et seq.*).

## PROJECT DESCRIPTION

FEMA is considering funding an application from the Village of Islamorada (Village) to construct a wastewater treatment system on Plantation Key that would serve approximately 5,000 people on Plantation Key Colony and North Plantation Key. For the proposed action, FEMA provided a determination that the project may affect, but is not likely to adversely affect federally listed threatened and endangered species or their habitat. The subject property is approximately 0.8 acre in size. It is located along the west side of U.S. Route 1, and bounded by two residential streets to the east and west. To the north are undeveloped, similarly forested parcels comprised of vegetation similar to that of the proposed site, although with a lesser occurrence of exotic vegetation. The project is located at mile marker 89.9, adjacent to the Overseas Highway U.S. Route 1, in Section 5, Township 63 South, Range 39 East, Plantation Key, Monroe County, Florida.

## THREATENED AND ENDANGERED SPECIES

The submitted vegetation survey indicates that the parcel is a disturbed, remnant, tropical hardwood hammock, which has experienced historical disturbance. The current conditions are



typical of disturbed tropical hardwood hammock that is experiencing naturally diverse vegetative recovery with the presence of invasive exotic species. Tropical hardwood hammocks are closed canopy forests dominated by a diverse assemblage of evergreen and semi-deciduous tree and shrub species, mostly of West Indian origin. The parcel is on the margin of a large subdivision that is almost fully built-out.

The habitat on the parcel proposed for development is tropical hardwood hammock. Tropical hardwood hammocks are closed canopy forests dominated by a diverse assemblage of evergreen and semi-deciduous tree and shrub species, mostly of West Indian origin. Based on information in the vegetation survey provided as an addendum to the application packet on March 7, 2003, the vegetation on the proposed project site is typical of more mature hammocks on the Keys, with a varied overstory including false tamarind (*Lysiloma latisiliquum*), poisonwood (*Metopium toxiferum*), Jamaican dogwood (*Piscidia piscipula*), West Indian mahogany (*Swietenia mahagoni*), gumbo limbo (*Bursera simaruba*), and pigeon plum (*Coccoloba diversifolia*). In addition to smaller individuals of the canopy species, Spanish stopper (*Eugenia foetida*), snowberry (*Chiococca alba*), wild coffee (*Psychotria nervosa*), and cheese shrub or yellow root (*Morinda royoc*) are understory species. Exotic species such as Brazilian pepper (*Schinus terebinthifolius*) and Australian pine (*Casuarina equisetifolia*) have invaded this hardwood hammock community, with Brazilian pepper comprising the dominant canopy in the western and southern portions of the site. Australian pine is a dominant component of the canopy in the portions of the site adjacent to U.S. Route 1. No jurisdictional wetlands or surface waters were identified at this site. Adjacent residences and undeveloped parcels are dominated by Brazilian pepper and Australian pine.

Wild lime (*Zanthoxylum fagara*), an understory plant found on site, is a species specifically utilized by the endangered Schaus swallowtail butterfly (*Heracles aristodemus ponceanus*) for egg deposition and larval host plants. The presence of hardwood hammock, and the project location near known habitat for the federally-listed endangered Schaus swallowtail butterfly, may predispose the project site to use by this butterfly.

The Schaus swallowtail is a large blackish-brown butterfly with contrasting markings that are mostly dull yellow. Their antennae are black with a yellow knob that has a black tip. The Schaus swallowtail butterfly is most easily confused with the giant swallowtail butterfly (*Heracles cressphontes*) which is widespread in eastern North America and also occurs in habitat occupied by the Schaus swallowtail. The two butterflies are easily separated by size and color: the giant swallowtail is larger than the Schaus swallowtail and is more nearly coal-black with brighter yellow lines.

The present distribution of the Schaus swallowtail extends from southern Miami-Dade County through the Keys in Biscayne Bay and north to southern Key Largo in the Upper Keys, to Lower Matecumbe Key in the Middle Keys. Schaus swallowtail butterfly distribution is limited to tropical hardwood hammocks and is concentrated in the insular portions of Miami-Dade and Monroe counties, from Elliott Key in Biscayne National Park and associated smaller Keys to central Key

Largo. Although a Schaus swallowtail butterfly was sighted on Lignumvitae Key, a State park, in 1973 and on Upper Matecumbe Key in 1986, regular sightings of this species are uncommon outside of Key Largo.

The Schaus swallowtail butterfly occurs exclusively in mature hardwood hammocks. Adults of this species may fly in clearings and along roads and trails, or even out over the ocean for short distances, but they typically remain in the hammocks proper. Feeding activity usually occurs on blossoms of wild coffee and cheese shrub (or yellow root), along the margins of these hammocks; they rarely feed in areas open to direct sunlight. Both cheese shrub and wild coffee are present on the parcel, as is wild lime. Hardwood hammocks providing suitable habitat within the present range of the Schaus swallowtail butterfly are essential for the continued survival this species. Tropical hardwood hammock suitable for Schaus swallowtail butterfly has been reduced by an estimated 57 percent in Biscayne National Park and 83 percent for Key Largo. The decline has been attributed primarily to habitat destruction. North Key Largo contains a large, relatively contiguous expanse of tropical hardwood hammock habitat, but habitat on Key Largo south of C.R. 905 is highly fragmented and greatly reduced from historic levels, placing greater importance on the preservation of tracts of hardwood hammock habitat remaining on Key Largo.

The applicant has proposed actions to minimize impacts to tropical hardwood hammock habitat. Key elements of the proposed mitigation strategy include:

- Avoidance of high-quality hammock habitat;
- Situating the treatment plant to minimize impact to desirable hammock species;
- Preservation of remaining hammock vegetation *in perpetuity*;
- Relocation of selected individual hammock plant/tree species from the impact area to an approved recipient site; and
- Landscaping the parcel with native hammock species.

On December 12<sup>th</sup> 2002, the Village Council passed a Chapter 380 Agreement (Agreement) between the Village and Florida Department of Community Affairs (DCA). This agreement allows the Village to construct a wastewater treatment plant, and to mitigate off site to meet the required open space ratio. Under the Agreement, the Village will site the treatment plant so as to minimize the area of existing desirable vegetation that would need to be removed. As required, the Village will submit the proposed site plans for the construction of the treatment plant to DCA for approval prior to construction.

As detailed in paragraph three of the Agreement, the Village will acquire hammock habitat of greater or equal habitat value to the impacted area in the general vicinity, at a 2:1 ratio. The property will be acquired by the Village no later than December 12<sup>th</sup>, 2003. The Village will place a conservation easement over the newly acquired hammock area, prohibiting any future development or clearing of the property. The Village will coordinate with DCA to develop a management plan for the acquired hammock property.

Prior to the construction phase of this project, the Village will prepare a Tree Relocation Plan and submit a copy to the Service for review and approval. This plan will detail the process of tree selection, removal, replanting, and success monitoring. The Village would retain a qualified biologist to remove selected individuals from the impacted area prior to construction and transplant such species to a suitable publicly owned recipient site(s) located within the Village. Species to be transplanted may include Florida thatch palm (*Thrinax radiata*), mahogany, or gumbo limbo. In addition, if Florida tree snails are found within the area to be impacted, they would be relocated to a suitable publicly owned recipient site within the Village.

Furthermore, in an effort to minimize construction-related impacts to existing hammock species, relevant portions of the treatment plant site would be replanted with appropriate native hammock species following construction. The Village has committed to utilizing no less than 75 percent native species in its landscaping plan, with the remaining 25 percent consisting of native drought tolerant species.

Conservation of the Schaus swallowtail butterfly can be compatible with development in areas such as this subdivision. The plants required for breeding of Schaus swallowtail butterfly include wild lime and torchwood (*Amyris elemifera*). Wild lime currently exists on the property. Torchwood can be obtained at local native nurseries. We encourage the applicants to consider improving the habitat value of tropical hardwood hammock remaining on the project site after development by including both of these species and food source species (wild coffee, cheese shrub) in the final landscape design. Many species of butterflies in addition to the Schaus swallowtail butterfly are attracted to these host plants, creating a unique opportunity to observe endangered species in a residential setting.

In addition, the project site may be occupied or contains habitat for one other listed animal protected by the State of Florida: the white crowned pigeon (*Columba leucocephala*). The abundance of native fruit producing trees in this tropical hardwood hammock offers excellent foraging opportunities for the white-crowned pigeon and other migratory birds. The white-crowned pigeon utilizes Florida Keys hammocks to forage and rest during its nesting season - typically May through September. Declining hardwood forest habitat of the Florida Keys is a major part the scientific basis for listing the white-crowned pigeon as a threatened species by the State of Florida.

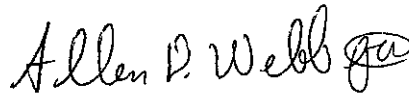
To help offset potential impacts to the white-crowned pigeon population, we encourage applicants to consider improving the habitat value of tropical hardwood hammock remaining on the project site after development. This can be accomplished simply by incorporating native trees preferred by white-crowned pigeons in a landscape plan. This action should increase potential foraging opportunities for white-crowned pigeons and may attract many other neotropical migratory birds species to the site.

Laura J. Cherney  
April 22, 2003  
Page 5

Based upon current biological information on Schaus swallowtail butterfly and our review of your project proposal and biological information, the Service concurs with FEMA's determination that the above listed project may affect, but is not likely to adversely affect federally listed threatened or endangered species or critical habitat. If modifications are made to the project, or if additional information involving potential effects to listed species becomes available, please coordinate with the Service.

Thank you for your assistance in conserving the environment of the Florida Keys. If you have any questions, please contact Andrew Gude at 305-872-5563.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Linda S. Ferrell", followed by a small circular mark.

Linda S. Ferrell  
Assistant Field Supervisor  
South Florida Ecological Services Office



February 18, 2003

Ms. Jocelyn Karazsia  
National Marine Fisheries Service  
Division of Habitat Conservation  
11420 N. Kendall Drive, Suite 103  
Miami, Florida 33176

**RE: NEPA Notice of Draft Supplemental Environmental Assessment (SEA); ESA Section 7 Informal Consultation Request; and MSFCMA Consultation Request for the Plantation Key Colony/North Plantation Key Wastewater System, Monroe County, Florida**

Dear Ms. Karazsia:

The purpose of this letter is to provide your agency with notice that URS Group, Inc. (URS), on behalf of the Federal Emergency Management Agency (FEMA), is preparing a Draft Supplemental Environmental Assessment (SEA); pursuant to the National Environmental Policy Act; for the Plantation Key Colony/North Plantation Key Wastewater System, Monroe County, Florida. The Draft SEA evaluates three wastewater management alternatives proposed for Plantation Key Colony/North Plantation Key: No Action (Alternative 1); Centralized Wastewater Treatment Plant on Bayside (Alternative 2); and Centralized Wastewater Treatment Plant on Oceanside (Alternative 3). At this time, FEMA requests your concurrence with their findings of no effect in compliance with Section 7 of the Endangered Species Act, and the Essential Fish Habitat provisions of the Magnuson-Stevens Fishery Conservation and Management Act for the three alternatives under review.

FEMA is considering funding an application from the Village of Islamorada (Village) to construct a wastewater treatment system that would serve approximately 5,000 people on Plantation Key Colony/North Plantation Key in the Florida Keys. The purpose of the Village project is to reduce wastewater nutrient loading at selected Monroe County-identified "hot spots" to improve water quality; these "hot spots" are believed to contribute to water quality degradation. The Monroe County Sanitary Wastewater Master Plan ranked Plantation Key as the 19<sup>th</sup> most critical "hot spot" in the Florida Keys. The "hot spot" ranking is linked to the use of cesspools and septic systems as Plantation Key Colony/North Plantation Key's main wastewater treatment systems. FEMA would provide funding assistance to the Village as part of their effort to assist residents in Plantation Key Colony/North Plantation Key in meeting the Florida Statutory Treatment Standards of 2010 for wastewater effluent disposal to shallow wells. A

URS Corporation  
Eastern Financial Building, Suite 1000  
700 South Royal Poinciana Boulevard  
Miami Springs, FL 33166  
Tel: 305.884.8900  
Fax: 305.884.2665



Ms. Jocelyn Karazsia  
National Marine Fisheries Service  
February 18, 2003  
Page 2 of 3

description of the range of alternatives for the proposed wastewater treatment system as well as a street map of the project vicinity is attached.

Current lists of special status species with the potential to occur in Monroe County were obtained from "Threatened and Endangered Species Software (TESS), Version 2.0," from the U.S. Fish and Wildlife Service (FWS) Threatened and Endangered Species Internet site (<http://endangered.fws.gov/>), as well as the internet sites for the Gulf of Mexico Fishery Management Council (<http://www.gulfcouncil.org/>) and the South Atlantic Fishery Management Council (<http://www.safmc.net/>).

On July 31, 2002, URS biologists Michael Breiner and Keith Stannard performed reconnaissance level field surveys at the proposed alternative sites. The purpose of these surveys, conducted concurrently with vegetation and wildlife investigations, was to investigate the potential presence of federally protected species and/or suitable habitat for these species in each of the proposed alternative sites. The following two sites were investigated:

- **Plantation Key Preferred Site** - Wastewater Treatment Plant (WWTP) Preferred Site located on the west side (bay side) of US Highway 1 (US-1) at approximate MM 89.8 on Plantation Key; and
- **Plantation Key Alternate Site** - WWTP Alternate Site located on the east side (ocean side) of US-1 at approximate MM 89.75 on Plantation Key.

Under Alternatives 2 and 3, no marine resources, tidal wetlands or other potential Essential Fish Habitat (EFH) occur within 300 feet of the proposed alternative sites. Neither construction nor operation of either alternative will affect EFH. Further, as described in Section 3.3 (Biological Resources) and Section 3.6.2 (Fishing Industry) of the Programmatic Environmental Assessment for Wastewater Improvements in the Florida Keys, implementation of the either alternative is expected to improve nearshore water quality, by reducing nutrient loading. Seagrasses, mangroves and hardbottom habitats serve as critical nursery habitat for commercially significant fisheries species as well as several Federal and state-listed marine species. Their health is dependent to a large degree on water quality. Therefore, the implementation of the either alternative is expected to have a net positive effect on EFH as well as Federally listed marine species.

In order to further ensure that EFH is not affected, the Village would employ best management practices (BMPs) to prevent concrete, steel and other demolition debris, waste, and construction material from entering tidal wetlands and/or marine waters.



Ms. Jocelyn Karazsia  
National Marine Fisheries Service  
February 18, 2003  
Page 3 of 3

These measures may include the deployment of silt screens, turbidity curtains, or other barriers prior to commencement of construction.

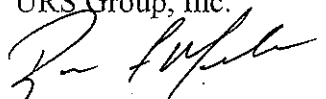
All equipment operating in the project area would be regularly cleaned, checked for leaks, and otherwise maintained. Equipment refueling would be done away from marine waters, and, in the unlikely event that a fuel leak or spill were to occur, adequate containment equipment and cleanup (absorbent material) supplies would be readily available at the worksite.

No species listed for protection at the state or Federal levels were observed in either of the proposed areas alternative sites. Based on the results of the biological field visit, consultation with experts, and a review of special status species lists, FEMA finds that the proposed alternatives would not result in the take of threatened or endangered species or species protected under the Migratory Bird Treaty Act (MBTA), jeopardize the continued existence of these species, or adversely affect their habitat.

As part of the informal consultation process, FEMA respectfully seeks written concurrence with this determination of no effect within 30 days to the letterhead address. If you have any questions or comments, please do not hesitate to contact me at (305) 884-8900, or Ms. Science Kilner, FEMA Lead Environmental Specialist at (770) 220-5357. Thank you very much for your assistance.

Sincerely,

URS Group, Inc.

  
for Laura J. Cherney  
Environmental Scientist

Attachment as noted

cc: Rickey N. Ruebsamen, NMFS Southeast Region  
Science Kilner, FEMA Region IV, Lead Environmental Specialist  
Jon Randall, URS Group, Inc., Environmental Planner



UNITED STATES DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric Administration  
NATIONAL MARINE FISHERIES SERVICE

Southeast Regional Office  
9721 Executive Center Drive North  
St. Petersburg, Florida 33702

March 17, 2003

RECEIVED MAR 20 2003

Ms. Laura J. Cherney  
URS Corporation  
Eastern Financial Building, Suite 1000  
760 South Royal Poinciana Boulevard  
Miami Springs, Florida 33166

Dear Ms. Cherney:

The National Marine Fisheries Service (NOAA Fisheries) has reviewed the February 18, 2003, **Notice of Draft Supplemental Environmental Assessment (SEA) for the Plantation Key Wastewater System, Monroe County, Florida**, which you provided. By letter dated February 18, 2003, to the Federal Emergency Management Agency (FEMA), we provided comments on the September 20, 2002, Draft Programmatic Environmental Assessment (PEA) for the Proposed Wastewater Treatment Improvements in the Florida Keys, Florida. In addition, by letter dated February 27, 2003, to URS Corporation, NOAA Fisheries provided comments on the Draft Supplemental Environmental Assessment (SEA) for the Conch Key Wastewater System, Monroe County, Florida.

According to the information you provided, the URS Group, Inc., on behalf of FEMA, is preparing a SEA for the Plantation Key Wastewater System in Monroe County, Florida. FEMA is considering funding an application from the Village of Islamorada (Village) to construct a wastewater treatment system that would serve approximately 5,000 people on Plantation Key Colony/North Plantation Key in the Florida Keys. The propose of the Village's project is to reduce wastewater nutrient loading at selected Monroe County identified "hot spots," thereby improving water quality. These hot spots are believed to contribute to water quality degradation. The Monroe County Sanitary Wastewater Master Plan ranked Plantation Key as the 19<sup>th</sup> most critical hot spot in the Florida Keys. The hot spot ranking is linked to the use of cesspools and septic systems as Plantation Key Colony/North Plantation Key's principal means for wastewater treatment.

The Draft SEA evaluates three wastewater management alternatives for Plantation Key Colony/North Plantation Key. These alternatives include, Alternative 1: No Action; Alternative 2: Centralized Wastewater Treatment Plant on Bayside; and Alternative 3: Centralized Wastewater Treatment Plant on Oceanside. These three alternatives are briefly described below.





The No Action Alternative would not provide funding assistance to the Village for the proposed wastewater management project. In order to meet the Florida Statutory Treatment Standards of 2010, the Village and Plantation Key residents would need to identify another source of funding to manage wastewater.

The Centralized Wastewater Treatment Plant on Bayside (Alternative 2 and the Preferred Alternative) would involve the construction of a new wastewater treatment plant (WWTP) on the bayside of Plantation Key. This alternative would establish new service to residents having on-site systems within the Plantation Key Colony Service area. Through this alternative, existing cesspools and septic systems would be removed from residences and businesses in the service area. The North Plantation Key service area is comprised of two sub-service areas, i.e., Plantation Key Colony Subdivision Sub-service Area and North Plantation Key Sub-service Area. Wastewater improvements would be implemented for both sub-service areas in a phased approach. The proposed collection system would consist of a vacuum sewer system to collect and transfer wastewater flow from houses and businesses to the WWTP. Additional design elements include storage facilities for maintenance equipment, treatment chemicals, and other operation materials, as well as parking, paved access roads, and landscaping.

The Centralized Wastewater Treatment Plant on Oceanside (Alternative 3) would involve the construction of a new wastewater treatment plant (WWTP) on the oceanside of Plantation Key. Like Alternative 2, this alternative would establish new service to residents formerly on-site systems within the Plantation Key Colony Service area and the existing cesspools and septic systems would be removed from residences and businesses in the service area. Under this alternative, the engineering and system design are identical to Alternative 2; however, the construction of the WWTP would occur on an alternate side.

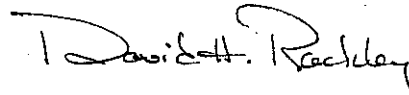
According to the information provided, Alternatives 2 and 3 are expected to improve nearshore water quality by reducing nutrient loading. In addition, no marine resources, tidal, wetlands, or other areas designated Essential Fish Habitat (EFH) occur within 300 feet of either proposed alternative site. Through execution of either Alternative, a net positive effect on EFH is expected, given that the health of seagrass, mangrove, and hardbottom habitats is dependent, to a large degree, on water quality. In addition, the Village would employ best management practices, as outlined in the information provided, to further ensure that EFH is not effected.

NOAA Fisheries concurs with the determination that construction of a Plantation Key Wastewater System is expected to have a beneficial effect with regard to Essential Fish Habitat (EFH). Nearshore marine habitats including seagrass communities and coral reefs are likely to benefit as a result of reductions in total suspended solids, nutrients, and pathogens that are expected in connection with wastewater improvement activities.

In conclusion, NOAA Fisheries supports improvement of the existing wastewater treatment facilities Keys-wide, including the proposed improvements at Plantation Key Colony/North Plantation Key. Reducing nutrient loading into nearshore waters from outdated septic systems and cesspits should result in improved water quality and positive effects on EFH and other NOAA Fisheries-trust resources in the Florida Keys.

At this time, we do not have specific comments or recommendations to provide. We look forward to working with FEMA and URS, Inc., as you develop more detailed information. If we can be of further assistance, please advise. Related comments, questions or correspondence should be directed to Ms. Jocelyn Karazsia in Miami, Florida, at (305) 595-8352.

Sincerely,



Rickey N. Ruebsamen  
Acting Assistant Regional Administrator  
Habitat Conservation Division

cc:

EPA, Marathon  
DEP, Marathon  
FFWCC, Tallahassee  
FWS, Big Pine Key  
F/SER4  
F/SER45-Karazsia



February 18, 2003

Ms. Georgia Cranmore  
Acting Assistant Regional Administrator  
National Marine Fisheries Service, Southeast Region  
Protective Resources Division  
9721 Executive Center Drive North  
St. Petersburg, FL 33702

**RE: NEPA Notice of Draft Supplemental Environmental Assessment (SEA); ESA  
Section 7 Informal Consultation Request; and MSFCMA Consultation  
Request for the Plantation Key Colony/North Plantation Key Wastewater  
System, Monroe County, Florida**

Dear Ms. Cranmore:

The purpose of this letter is to provide your agency with notice that URS Group, Inc. (URS), on behalf of the Federal Emergency Management Agency (FEMA), is preparing a Draft Supplemental Environmental Assessment (SEA); pursuant to the National Environmental Policy Act; for the Plantation Key Colony/North Plantation Key Wastewater System, Monroe County, Florida. The Draft SEA evaluates three wastewater management alternatives proposed for Plantation Key Colony/North Plantation Key: No Action (Alternative 1); Centralized Wastewater Treatment Plant on Bayside (Alternative 2); and Centralized Wastewater Treatment Plant on Oceanside (Alternative 3). At this time, FEMA requests your concurrence with their findings of no effect in compliance with Section 7 of the Endangered Species Act, and the Essential Fish Habitat provisions of the Magnuson-Stevens Fishery Conservation and Management Act for the three alternatives under review.

FEMA is considering funding an application from the Village of Islamorada (Village) to construct a wastewater treatment system that would serve approximately 5,000 people on Plantation Key Colony/North Plantation Key in the Florida Keys. The purpose of the Village project is to reduce wastewater nutrient loading at selected Monroe County-identified "hot spots" to improve water quality; these "hot spots" are believed to contribute to water quality degradation. The Monroe County Sanitary Wastewater Master Plan ranked Plantation Key as the 19<sup>th</sup> most critical "hot spot" in the Florida Keys. The "hot spot" ranking is linked to the use of cesspools and septic systems as Plantation Key Colony/North Plantation Key's main wastewater treatment systems. FEMA would provide funding assistance to the Village as part of their effort to assist residents in Plantation Key Colony/North Plantation Key in meeting the Florida Statutory

URS Corporation  
Eastern Financial Building, Suite 1000  
700 South Royal Poinciana Boulevard  
Miami Springs, FL 33166  
Tel: 305.884.8900  
Fax: 305.884.2665



Ms. Georgia Cranmore  
National Marine Fisheries Service  
February 18, 2003  
Page 2 of 3

Treatment Standards of 2010 for wastewater effluent disposal to shallow wells. A description of the range of alternatives for the proposed wastewater treatment system as well as a street map of the project vicinity is attached.

Current lists of special status species with the potential to occur in Monroe County were obtained from "Threatened and Endangered Species Software (TESS), Version 2.0," from the U.S. Fish and Wildlife Service (FWS) Threatened and Endangered Species Internet site (<http://endangered.fws.gov/>), as well as the internet sites for the Gulf of Mexico Fishery Management Council (<http://www.gulfcouncil.org/>) and the South Atlantic Fishery Management Council (<http://www.safmc.net/>).

On July 31, 2002, URS biologists Michael Breiner and Keith Stannard performed reconnaissance level field surveys at the proposed alternative sites. The purpose of these surveys, conducted concurrently with vegetation and wildlife investigations, was to investigate the potential presence of federally protected species and/or suitable habitat for these species in each of the proposed alternative sites. The following two sites were investigated:

- **Plantation Key Preferred Site** - Wastewater Treatment Plant (WWTP) Preferred Site located on the west side (bay side) of US Highway 1 (US-1) at approximate MM 89.8 on Plantation Key; and
- **Plantation Key Alternate Site** - WWTP Alternate Site located on the east side (ocean side) of US-1 at approximate MM 89.75 on Plantation Key.

Under Alternatives 2 and 3, no marine resources, tidal wetlands or other potential Essential Fish Habitat (EFH) occur within 300 feet of the proposed alternative sites. Neither construction nor operation of either alternative will affect EFH. Further, as described in Section 3.3 (Biological Resources) and Section 3.6.2 (Fishing Industry) of the Programmatic Environmental Assessment for Wastewater Improvements in the Florida Keys, implementation of the either alternative is expected to improve nearshore water quality, by reducing nutrient loading. Seagrasses, mangroves and hardbottom habitats serve as critical nursery habitat for commercially significant fisheries species as well as several Federal and state-listed marine species. Their health is dependent to a large degree on water quality. Therefore, the implementation of the either alternative is expected to have a net positive effect on EFH as well as Federally listed marine species.

In order to further ensure that EFH is not affected, the Village would employ best management practices (BMPs) to prevent concrete, steel and other demolition debris,



Ms. Georgia Cranmore  
National Marine Fisheries Service  
February 18, 2003  
Page 3 of 3

waste, and construction material from entering tidal wetlands and/or marine waters. These measures may include the deployment of silt screens, turbidity curtains, or other barriers prior to commencement of construction.

All equipment operating in the project area would be regularly cleaned, checked for leaks, and otherwise maintained. Equipment refueling would be done away from marine waters, and, in the unlikely event that a fuel leak or spill were to occur, adequate containment equipment and cleanup (absorbent material) supplies would be readily available at the worksite.

No species listed for protection at the state or Federal levels were observed in either of the proposed areas alternative sites. Based on the results of the biological field visit, consultation with experts, and a review of special status species lists, FEMA finds that the proposed alternatives would not result in the take of threatened or endangered species or species protected under the Migratory Bird Treaty Act (MBTA), jeopardize the continued existence of these species, or adversely affect their habitat.

As part of the informal consultation process, FEMA respectfully seeks written concurrence with this determination of no effect within 30 days to the letterhead address. If you have any questions or comments, please do not hesitate to contact me at (305) 884-8900, or Ms. Science Kilner, FEMA Lead Environmental Specialist at (770) 220-5357. Thank you very much for your assistance.

Sincerely,

URS Group, Inc.

A handwritten signature in black ink, appearing to read "Laura J. Cherney".

Laura J. Cherney  
Environmental Scientist

Attachments as noted

cc: Science Kilner, FEMA Region IV, Lead Environmental Specialist  
Jon Randall, URS Group, Inc., Environmental Planner



UNITED STATES DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric Administration  
NATIONAL MARINE FISHERIES SERVICE

RECEIVED APR 03 2003

Southeast Regional Office  
9721 Executive Center Drive North  
St. Petersburg, FL 33702  
(727) 570-5312, FAX 570-5517  
<http://caldera.sero.nmfs.gov>

MAR 31 2003

F/SER3:KPB

Laura J. Cherney  
Environmental Scientist  
URS Corporation  
Eastern Financial Building, Suite 1000  
700 South Royal Poinciana Boulevard  
Miami Springs, FL 33166

Dear Ms. Cherney:

We have reviewed your letter dated February 18, 2003, and associated documents regarding the Plantation Key Colony/North Plantation Key Wastewater System, Monroe County, Florida, submitted on behalf of the Federal Emergency Management Agency (FEMA). We have reviewed the possible effects on the species listed under the Endangered Species Act (ESA) and under the purview of the National Marine Fisheries Service (NOAA Fisheries) pursuant to the inter-agency consultation requirements of section 7 of the ESA. Please refer to consultation number I/SER/2003/00207 in future correspondence on this project.

FEMA is considering an application from the Village of Islamorada to construct a wastewater treatment facility that would serve approximately 5,000 people. These locales presently utilize cesspools and septic systems as the main wastewater treatment methods. The purpose of the project is to improve water quality by reducing wastewater nutrient loading in an area that is presently identified as a Monroe County "hot spot" of water quality degradation in the Florida Keys. This "hot spot" represents a populated area with the poor existing wastewater management practices of the existing cesspools and septic systems. The wastewater treatment facility is expected to improve water quality for mangroves, seagrasses, benthos, and other nearshore habitats. The preferred site for the wastewater treatment facility, located on the bay side of US-1 at marker 89.8 on Plantation Key, is L-shaped and approximately 0.8 acres in size. The alternative site is located on the ocean side of US-1 at mile marker 89.75 on Plantation Key. No marine resources occur within 300 feet of either proposed site.

ESA-listed species under the purview of NOAA Fisheries which are considered under this ESA section 7 consultation include the green (*Chelonia mydas*), loggerhead (*Caretta caretta*), Kemp's ridley (*Lepidochelys kempii*), leatherback (*Dermochelys coriacea*), and hawksbill (*Eretmochelys imbricata*) sea turtles. The smalltooth sawfish (*Pristis pectinata*) has been proposed for listing under the ESA and may also be present in the action area. No critical habitat has been designated for these species within the project area.

Construction of the treatment facility would require installation of treatment tanks, in-ground and above-ground pipes, plumbing stations, and sand or filtration facilities. Other construction involves storage and operations areas for the treatment facility, administration buildings, parking lot, and



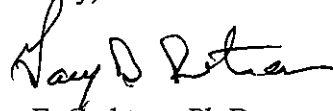
access road. The removal of existing septic systems and pipeline trenching activities would occur throughout the service area. Cesspools and septic systems would need to be removed on North Plantation Key as a result of the project, pursuant to the Florida Department of Health requirements. It is reasonable to assume some increases in turbidity may result from sediment runoff from construction sites during rainfall. The deployment of silt screens, turbidity curtains, and any other necessary barriers to prevent any unnecessary disturbance to marine waters will also benefit protected species habitats. Due to these measures to reduce runoff, any effects resulting from increased water turbidity are expected to have a negligible impact on these species.

We concur with your draft determination that the proposed activity will not likely adversely affect endangered and threatened species, or their critical habitat, under the purview of NOAA Fisheries. This concludes consultation responsibilities under section 7 of the ESA. A new consultation should be initiated if there is a take, new information reveals impacts of the identified activity that may affect listed species or their critical habitat, a new species is listed, the identified activity is subsequently modified or critical habitat designated that may be affected by the identified activity.

You indicate in your letter the project is expected to have a net positive effect on EFH. The action agency is also reminded that, in addition to its protected species/critical habitat consultation requirements with NOAA Fisheries' PRD pursuant to section 7 of the ESA, prior to proceeding with the proposed action the action agency must also consult with NOAA Fisheries' Habitat Conservation Division (HCD) pursuant to the Magnuson-Stevens Fishery Conservation and Management Act's requirements for essential fish habitat (EFH) consultation (16 U.S.C. 1855 (b)(2) and 50 CFR 600.905-.930, subpart K). The action agency should also ensure that the applicant understands the ESA and EFH processes; that ESA and EFH consultations are separate, distinct, and guided by different statutes, goals, and time lines for responding to the action agency; and that the action agency will (and the applicant may) receive separate consultation correspondence on NOAA Fisheries letterhead from HCD regarding their concerns and/or finalizing EFH consultation. Consultation is not complete until EFH and ESA concerns have been addressed to NOAA Fisheries' satisfaction. The HCD biologist for this region is Ms. Jocelyn Karazsia. If you have any questions about consultation regarding essential fish habitat for this project, please contact Ms. Karazsia at (305) 595-8352.

We look forward to our continuing cooperation on protecting our threatened and endangered species. If you have any questions, please contact Kyle Baker, fishery biologist, at the number above or via e-mail at [Kyle.Baker@noaa.gov](mailto:Kyle.Baker@noaa.gov).

Sincerely,

  
for, Roy E. Crabtree, Ph.D.  
Regional Administrator

cc: FEMA Region IV - Science Kilner  
F/PR3; F/SER43 - Mike Johnson  
O:\SECTION7\INFORMAL\FEMA-Plantation Key Wastewater Plan.wpd  
File: 1514.22.O.3 FEMA; No. I/SER/2003/00207



January 31, 2003

Florida State Clearinghouse  
Department of Community Affairs  
2555 Shumard Oak Boulevard  
Tallahassee, Florida 32399-2100

**Subject: Notice of Draft Supplemental Environmental Assessment (SEA) for  
the Plantation Key Colony/North Plantation Key Wastewater System,  
Monroe County, Florida.**

Dear Sir or Madam:

This purpose of this letter is to provide your agency with notice that URS Corporation, on behalf of the Federal Emergency Management Agency (FEMA), is preparing a Draft Supplemental Environmental Assessment (SEA) for the Plantation Key Colony/North Plantation Key Wastewater System, Monroe County, Florida. The Draft SEA evaluates several wastewater management alternatives proposed for Plantation Key Colony/North Plantation Key, and the potential environmental consequences associated with those alternatives. At this time, FEMA requests your comments regarding the range of alternatives (attached).

In 1998, during the aftermath of Hurricane Georges, Congress allocated additional monies for long-term disaster recovery projects in the State of Florida to assist counties whose needs were yet unmet through allocation of primary disaster relief funds. This Unmet Needs money was earmarked for the counties most impacted by Hurricane Georges, including Monroe County. Monroe County requested that wastewater management improvement projects be considered for disaster funding since many existing wastewater facilities do not provide adequate collection, treatment, or disposal, and thus contribute to degrading water quality in the Florida Keys. Since then, FEMA has received a grant application from the Florida Keys Aqueduct Authority requesting Federal assistance to upgrade the current wastewater treatment facilities on Plantation Key Colony/North Plantation Key.

The National Environmental Policy Act of 1969 (NEPA), the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR Parts 1500 through 1508), and FEMA regulations for NEPA compliance (44 CFR Part 10) direct FEMA and other Federal agencies to fully understand and take into consideration during decision making, the environmental consequences of proposed Federal actions (projects). Therefore, FEMA must comply with NEPA, and other applicable Federal laws and regulations,

URS Corporation  
Eastern Financial Building, Suite 1000  
700 South Royal Poinciana Boulevard  
Miami Springs, FL 33166  
Tel: 305.884.8900  
Fax: 305.884.2665



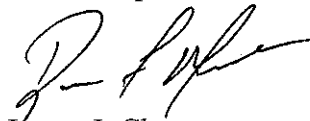
before making Federal funds available for any disaster recovery and mitigation actions. A Programmatic Environmental Assessment (PEA) for Wastewater Management Improvements in the Florida Keys was prepared in accordance with these regulations, and provides a framework to address impacts of a range of wastewater treatment projects in the Florida Keys. In accordance with 40 CFR Part 1508.28, the Draft SEA for Plantation Key Colony/North Plantation Key tiers from the PEA, and addresses issues specific to this project location.

Please submit your comments to me, in writing, at the contact information listed below within 30 days receipt of this notice.

Laura J. Cherney  
URS Corporation  
700 South Royal Poinciana Blvd., Suite 1000  
Miami Springs, Florida 33166  
Fax: (305) 884-2665  
Email: [laura\\_j\\_cherney@urscorp.com](mailto:laura_j_cherney@urscorp.com)

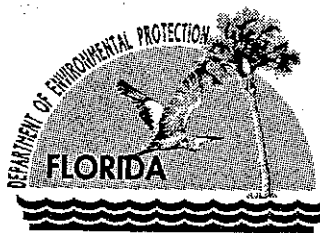
Your comments will be considered during the Draft SEA preparation process. Thank you for your involvement in this documentation process.

Sincerely,  
**URS Corporation**

  
Laura J. Cherney  
Project Environmental Scientist

Attachment

Cc: Science Kilner, FEMA Region IV, Lead Environmental Specialist  
Jon Randall, URS Corporation, Environmental Planner



Jeb Bush  
Governor

# Department of Environmental Protection

Marjory Stoneman Douglas Building  
3900 Commonwealth Boulevard  
Tallahassee, Florida 32399-3000

David B. Struhs  
Secretary

April 4, 2003

Ms. Laura Cherney  
URS Corporation  
700 South Royal Poinciana Blvd.  
Suite 1000  
Miami Springs, Florida 33166

Re: Federal Emergency Management Agency (FEMA), Notice of Draft Supplemental Environmental Assessment (DSEA) for the Plantation Key Colony/North Plantation Key Wastewater System, Monroe County, Florida

SAI: FL200302073392C

Dear Ms. Cherney:

The Florida State Clearinghouse, pursuant to Executive Order 12372, Gubernatorial Executive Order 95-359, the Coastal Zone Management Act, 16 U.S.C. §§ 1451-1464, as amended, and the National Environmental Policy Act, 42 U.S.C. §§ 4321, 4331-4335, 4341-4347, as amended, has coordinated the review of the above-referenced Draft Supplemental Environmental Assessment (DSEA) for the proposed project.

The Department of Environmental Protection (DEP) indicates that the project is consistent with the Monroe County Sanitary Wastewater Master Plan; however, several requirements must be met prior to initiation of the project. DEP will require Environmental Resource Permits for activities that may impact surface waters or wetlands in the area, and a National Pollutant Discharge Elimination System (NPDES) permit may be required for stormwater management. DEP recommends use of future populations to be served by the wastewater treatment system, in lieu of the Equivalent Dwelling Units that are discussed in the proposal. Please see the enclosed comments from DEP for additional requirements.

The Department of Community Affairs (DCA) supports alternative 1.2.2.2, the site located on six contiguous vacant lots on the bayside of Plantation Key at MM 89.9. Please see the enclosed comments from DCA.

The South Florida Regional Planning Council (SFRPC) states that the project is intended to provide improved water quality and should be of benefit to the South Florida area. The Council has summarized the relevant goals and policies that apply to this project. Please see the attached comments from the SFRPC and specific recommendations for complying with permitting requirements.

*"More Protection, Less Process"*

*Printed on recycled paper.*

Ms. Laura Cherney  
April 4, 2003  
Page 2

Based on the information contained in the DSEA, and the comments provided by our reviewing agencies, as summarized above and enclosed, the state has determined that, at this stage, the above-referenced project is consistent with the Florida Coastal Management Program (FCMP). All subsequent environmental documents prepared for this project must be reviewed to determine the project's continued consistency with the FCMP. The state's continued concurrence with the project will be based, in part, on the adequate resolution of issues identified during this and subsequent reviews. The state's final concurrence of the project's consistency with the FCMP will be determined during the environmental permitting stage.

Thank you for the opportunity to review this project. If you have any questions regarding this letter, please contact Mr. Bob Hall at 850/245-2163.

Sincerely,



Sally B. Mann, Director  
Office of Intergovernmental Programs

SBM/rwh  
Enclosures

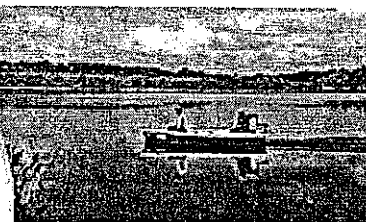
cc: Gus Rios, DEP, Marathon  
Abdul Ahmadi, DEP, Ft. Myers  
Rebecca Jetton, DCA, Marathon  
Terese M. Manning, SFRPC



# Florida

## Department of Environmental Protection

"More Protection, Less Process"


[Categories](#)
[DEP Home](#) | [Contact DEP](#) | [Search](#) | [DEP Site Map](#)

Project Information	
<b>Project:</b>	FL200302073392C
<b>Due Date:</b>	MARCH 09, 2003
<b>Description:</b>	Federal Emergency Management Agency - Notice of Draft Supplemental Environmental Assessment (SEA) for the Plantation Key Colony/North Plantation Key Wastewater System - Monroe County, Florida.
<b>Keywords:</b>	FEMA-DSEA- Key Colony Wastewater System - Monroe
<b>Program:</b>	
Agency Comments:	
<b>SOUTH FL RPC - SOUTH FLORIDA REGIONAL PLANNING COUNCIL</b>	
We have reviewed the January 2003 Environmental Assessment for the Plantation Key/North Plantation Key Wastewater System and have the following comments: Staff recognizes that this project is intended to provide improved water quality and wastewater treatment for the Florida Keys bringing the collection, treatment, and disposal system into compliance with federal, state, and local environmental standards and regulations. See hard copy.	
<b>ENVIRONMENTAL POLICY UNIT - OFFICE OF POLICY AND BUDGET, ENVIRONMENTAL POLICY UNIT</b>	
No Final Comments Received	
<b>COMMUNITY AFFAIRS - FLORIDA DEPARTMENT OF COMMUNITY AFFAIRS</b>	
We support alternative 1.2.2.2., the site located on six contiguous vacant lots on the bayside Plantation Key at MM 89.9. Water quality improvement in the Florida Keys is a priority for the Department and we believe that the construction of this plant at this site is most desirable for reducing nutrient loading in the nearshore waters.	
<b>FISH and WILDLIFE COMMISSION - FLORIDA FISH AND WILDLIFE CONSERVATION COMMISSION</b>	
NC by Brian Barnett 2/13/03	
<b>HEALTH - FLORIDA DEPARTMENT OF HEALTH</b>	
nc	
<b>STATE - FLORIDA DEPARTMENT OF STATE</b>	
nc	
<b>TRANSPORTATION - FLORIDA DEPARTMENT OF TRANSPORTATION</b>	
- FDOT permits may be required for project-related activities, which occur within FDOT right-of-way. Therefore, it may be necessary to coordinate with the FDOT's Permit Office. - Should the need for lane closures or traffic channelization on the state roadway system arise, Maintenance-of-Traffic Plans may be necessary. Coordination with the FDOT Traffic Operations Office will be required.	
<b>ENVIRONMENTAL PROTECTION - FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION</b>	
No Final Comments Received	
<b>SOUTH FLORIDA WMD - SOUTH FLORIDA WATER MANAGEMENT DISTRICT</b>	
Consistent/No Comment	

Reviewer: bobh

Date: APR-04-2003

Comment:

DEP will require permits for the wastewater system as well as potential impacts to wetlands and surface waters in the vicinity of the project. Project may require an NPDES permit. Other recommendations were made related to use of population projections in lieu of EDU's.

Comment Type:

- ☐ Draft  
☐ Release Without Comment  
☐ Final and Release

Request Extension?

- ☒ No  
☐ Yes

Extend Comment Due Date until:

MAR 9 2003

Extensions are granted at the discretion of the Clearinghouse staff for the reviewing party. They are not necessarily the same as an official project extension.

For more information please contact the Clearinghouse Office at:

AGENCY CONTACT AND COORDINATOR (SCH)  
3900 COMMONWEALTH BOULEVARD MS-47  
TALLAHASSEE, FLORIDA 32399-3000  
TELEPHONE: (850) 245-2161  
FAX: (850) 245-2190

Visit the [Clearinghouse Home Page](#) to query other projects.

[Copyright and Disclaimer](#)  
[Privacy Statement](#)

## Memorandum

# Florida Department of Environmental Protection

---

**TO:** Florida State Clearinghouse

**FROM:** Robert W. Hall, Environmental Specialist  
Office of Intergovernmental Programs

**DATE:** April 4, 2003

**PROJECT:** FEMA, Notice of Draft Supplemental Environmental Assessment (SEA) for  
the Plantation Key Colony/North Plantation Key Wastewater System,  
Monroe County, Florida

**SAI:** FL200302073392C

---

The Department has reviewed the above-referenced project and offers the following comments.

### General

The project is consistent with the Monroe County Sanitary Wastewater Master Plan. The general location proposed for the project appears to be adequate for construction of the wastewater system. However, any dredging or filling in wetlands or surface waters will require Environmental Resource Permits (ERP) from DEP's Marathon office. Similarly, the construction of the wastewater collection, treatment and disposal systems will require wastewater permits from DEP's South District Office in Ft. Myers. The project managers must also contact the Department's NPDES Section in Tallahassee to determine if the construction projects will require NPDES permits for stormwater.

### Specific Comments

1. The projected wastewater flow is 70,420 GPD from 405 EDU's according to the report. If an Equivalent Dwelling Unit (EDU) is considered to generate 350 GPD, the projected flow will be much higher than the flow contained in the SEA report. A more reliable design figure will be the use of existing and future population to be served by the wastewater treatment system. Please note that the design flow will impact the treatment standards (BAT versus AWT) that may be applicable to the system.
2. Flow equalization needs to be considered in the wastewater treatment system design.
3. It is unclear whether or not filtration is provided. Filtration is required for reuse projects. Reuse is highly recommended.

Please make sure that all required permits for the collection system, plant and injection wells, as well as any ERP permits, are obtained prior to the commencement of any work at the selected site. For assistance with ERP permits the applicant should contact Mr. Gus Rios in DEP's Marathon office at 305/289-2310. Dr. Abdul Ahmadi, our Program Administrator for Water

**Memorandum**  
**SAI # FL200302073392C**  
**Page 2 of 2**

Facilities in Ft. Myers should be contacted for assistance with the engineering and permitting aspects of the wastewater treatment systems. Dr. Ahmadi may be reached at 239/332-6975. The Tallahassee NPDES office may be reached at 850/245-7522.



*See attached*  
*E*

STATE OF FLORIDA  
**DEPARTMENT OF COMMUNITY AFFAIRS**

*"Dedicated to making Florida a better place to call home"*

JEB BUSH  
Governor

COLLEEN CASTILLE  
Secretary

March 4, 2003

Laura J. Cherney  
Project Environmental Specialist  
700 South Royal Poinciana Blvd., Suite 1000  
Miami Springs, FL 33166

**Subject: Plantation Key Colony/North Plantation Key Wastewater System**  
**SAI Number FL200302073392C**

Dear Ms. Cherney:

Thank you for your letter dated January 31, 2003, regarding the Plantation Key Colony/North Plantation Key Wastewater System. The Department has reviewed the evaluation of several alternatives and the potential environmental consequences associated with those alternatives.

We support alternative 1.2.2.2, the site located on six contiguous vacant lots on the bayside of Plantation Key at MM 89.9. The site is immediately northeast of Plantation Key Elementary School on the southeast corner of the PKC Sub-service area.

Water quality improvement in the Florida Keys is a priority for the Department and we believe that the construction of this plant at this site is most desirable for reducing nutrient loading in the nearshore waters.

Thank you for the opportunity to comment on this project. If you have any questions, please contact Rebecca Jetton, (305) 289-2402, Critical State Concern Field Office in Marathon.

Sincerely,

H.E "Sonny" Timmerman, Director  
Division of Community Planning

2555 SHUMARD OAK BOULEVARD \$ TALLAHASSEE, FLORIDA 32399-2100  
Phone: 850.488.8466/Suncom 278.8466 FAX: 850.921.0781/Suncom 291.0781  
Internet address: <http://www.dca.state.fl.us>

CRITICAL STATE CONCERN FIELD OFFICE  
2796 Overseas Highway, Suite 212  
Marathon, FL 33050-2227  
(305) 289-2402

COMMUNITY PLANNING  
2555 Shumard Oak Boulevard  
Tallahassee, FL 32399-2100  
(850) 488-2356

EMERGENCY MANAGEMENT  
2555 Shumard Oak Boulevard  
Tallahassee, FL 32399-2100  
(850) 413-9969

HOUSING & COMMUNITY DEVELOPMENT  
2555 Shumard Oak Boulevard  
Tallahassee, FL 32399-2100  
(850) 488-7956



Hall, Bob

---

From: Hall, Bob  
Sent: Wednesday, March 12, 2003 4:37 PM  
To: 'jetton@mail.state.fl.us'  
Cc: Milligan, Lauren  
Subject: State Clearinhouse Function

Rebecca,

How is everything in paradise? I understand from Gus Rios, it is expensive, but beautiful.

We need your help in directing DCA mail to the new State Clearinghouse Office (CLH) here in the Department of Environmental Protection (DEP).

The Office of Intergovernmental Programs, in the Office of the Secretary, became the State Clearinghouse in July, 2002, and we are still attempting to smooth out a few rough spots from the transition. Some of the comments that are supposed to come directly to this office are being sent by DCA to the respective applicants to submit materials to the CLH for review and comment. Projects whose letters are mailed directly to the applicant are not receiving the necessary CLH endorsement that will be required for grant applications or other types of projects that need the State CLH consistency determination.

Yesterday, we received two letters that were drafted for Sonny Timmerman's signature (not signed) that relate to projects in the Florida Keys -- SAI FL200202073396C, Conch Key WW system; and, SAI FL200302073392C, Plantation Key Colony WW system. These comments were addressed to the applicant, Laura J. Cherney, with the consulting firm of URS and were E-mailed to Cindy Cranick, the former CLH coordinator (Cindy has left the agency).

We would appreciate it if you would ask your staff to address their comments to this office, since we now prepare the State's response under the authority of the Coastal Zone Management Act. If the DCA comments must first go through Sonny Timmerman, then we would appreciate it if his letter would be addressed as follows:

Ms. Lauren Milligan  
Environmental Consultant  
State Clearinghouse  
Office of Intergovernmental Programs, MS 47  
3900 Commonwealth Blvd  
Tallahassee, FL 32399-3000

Lauren will be supervising the mailout of CLH projects and the receipt of agency comments, and I'm sure you will find her as helpful and knowledgeable as I have these past several years that we have worked together. Please call Lauren or me at 850/245-2163 if you have any questions about our new responsibilities. Thank you in advance for your help.

Sincerely,  
Bob Hall

South  
Florida  
Regional  
Planning  
Council



BH

March 24, 2003

Ms. Lauren Milligan  
Florida State Clearinghouse  
Florida Department of Environmental Protection  
3900 Commonwealth Blvd., Mail Station 47  
Tallahassee, FL 32399-3000

RE: SFRPC #03-0225, SAI #FL200302073392C- Request for comments on a Draft Supplemental Environmental Assessment for the Plantation Key/North Plantation Key Wastewater System, Federal Emergency Management Agency, Monroe County.

Dear Ms. Milligan:

We have reviewed the January 2003 Environmental Assessment for the Plantation Key/North Plantation Key Wastewater System and have the following comments:

- Staff recognizes that this project is intended to provide improved water quality and wastewater treatment for the Florida Keys bringing the collection, treatment, and disposal system into compliance with federal, state, and local environmental standards and regulations.
- The goals and policies of the SRPP for South Florida, in particular those indicated below, should be considered when making decisions regarding this project.

#### Strategic Regional Goal

- 2.3 Enhance the economic competitiveness of the region and ensure the adequacy of its public facilities and services by eliminating the existing backlog, meeting the need for growth in a timely manner, improving the quality of services provided and pursuing cost-effectiveness and equitability in their production, delivery and financing.

#### Regional Policies

- 2.3.3 The public sector should give priority to the funding of those improvements which support the general welfare of its citizenry and promote public goals, objectives and plans.
- 2.3.4 Decisions regarding the location, rate and intensity of development shall be based on the existing or programmed capacity of infrastructure and support services or on capacity which will be programmed to serve that development; in addition, consideration should be given to the impact of infrastructure and support services on natural resources.
- 2.3.22 Encourage the application of resource recovery, recycling, cogeneration, district cooling, water re-use systems, and other appropriate mechanisms where they are cost-effective and environmentally sound, as means of reducing the impacts of new development on existing public facilities and services, and the costs of providing new public facilities and services.

RECEIVED

MAR 28 2003

3440 Hollywood Boulevard, Suite 140, Hollywood, Florida 33301  
Broward (954) 985-4416, State (800) 985-4416  
SunCom 473-4416, FAX (954) 985-4417, Sun Com FAX 473-4417  
email: sfadmin@sfrpc.com, website: www.sfrpc.com

OLGA

Strategic Regional Goal

3.2 Develop a more efficient and sustainable allocation of the water resources of the region.

Regional Policies

3.2.9 Require all inappropriate inputs into Natural Resources of Regional Significance to be eliminated through such means as; redirection of offending outfalls, suitable treatment improvements or retrofitting options.

Thank you for the opportunity to comment. If you require further information, please contact me.

Sincerely,

A handwritten signature in cursive script, reading "Terese Manning".

Terese M. Manning  
Senior Planner

TMM/th

cc: Timothy McGarry, Monroe County  
Lynn Griffin, Coastal Program Administrator, FCMP

87

COUNTY: MONROE

DATE: 2/3/03

COMMENTS DUE DATE: 3/9/03

CLEARANCE DUE DATE: 4/4/03

Message:

SAI#: FL200302073392C

STATE AGENCIES

WATER MNGMNT. DISTRICTS

OPB POLICY UNITS

X COMMUNITY AFFAIRS  
FISH and WILDLIFE COMMISSION  
HEALTH  
STATE  
TRANSPORTATION  
ENVIRONMENTAL PROTECTION

SOUTH FLORIDA WMD

ENVIRONMENTAL POLICY UNIT

The attached document requires a Coastal Zone Management Act/Florida Coastal Management Program consistency evaluation and is categorized one of the following:

- Federal Assistance to State or Local Government (15 CFR 930, Subpart F). Agencies are required to evaluate the consistency of the activity.
- X Direct Federal Activity (15 CFR 930, Subpart C). Federal Agencies are required to furnish a consistency determination for the State's concurrence or objection.
- Outer Continental Shelf Exploration, Development or Production Activities (15 CFR 930, Subpart E). Operators are required to provide a consistency certification for state concurrence/objection.
- Federal Licensing or Permitting Activity (15 CFR 930, Subpart D). Such projects will only be evaluated for consistency when there is not an analogous state license or permit.

Project Description:

Federal Emergency Management Agency - Notice of Draft Supplemental Environmental Assessment (SEA) for the Plantation Key Colony/North Plantation Key Wastewater System - Monroe County, Florida.

RECEIVED

MAR 05 2003

OIP/OLGA

To: Florida State Clearinghouse

EO. 12372/NEPA

Federal Consistency

AGENCY CONTACT AND COORDINATOR (SCH)

2555 SHUMARD OAK BLVD

TALLAHASSEE, FLORIDA 32399-2100

(850) 414-6580 (SC 994-6580)

(850) 414-0479

- ☐ No Comment
- ☒ Comment Attached
- ☐ Not Applicable

- ☐ No Comment/Consistent
- ☐ Consistent/Comments Attached
- ☐ Inconsistent/Comments Attached
- ☐ Not Applicable

From:

Division/Bureau: DCA/DCP

Reviewer:

Date: 3/3/03



STATE OF FLORIDA  
**DEPARTMENT OF COMMUNITY  
AFFAIRS**

*"Dedicated to making Florida a better place to call home"*

**JEB BUSH**  
Governor

**COLLEEN CASTILLE**  
Secretary

February 25, 2003

Laura J. Cherney  
Project Environmental Specialist  
700 South Royal Poinciana Blvd., Suite 1000  
Miami Springs, FL 33166

**Subject:        Plantation Key Colony/North Plantation Key Wastewater System**  
**SAI Number FL200302073392C**


Dear Ms. Cherney:

Thank you for your letter dated January 31, 2003, regarding the Plantation Key Colony/North Plantation Key Wastewater System. The Department has reviewed the evaluation of several alternatives and the potential environmental consequences associated with those alternatives.

We support alternative 1.2.2.2, the site located on six contiguous vacant lots on the bayside of Plantation Key at MM 89.9. The site is immediately northeast of Plantation Key Elementary School on the southeast corner of the PKC Sub-service area.

Water quality improvement in the Florida Keys is a priority for the Department and we believe that the construction of this plant at this site is most desirable for reducing nutrient loading in the nearshore waters.

Sincerely,

  
Rebecca Jetton, Administrator  
Florida Keys Area of Critical State Concern

**2555 SHUMARD OAK BOULEVARD • TALLAHASSEE, FLORIDA 32399-2100**  
Phone: 850.488.8466/Suncom 278.8466    FAX: 850.921.0781/Suncom 291.0781  
Internet address: <http://www.dca.state.fl.us>

**CRITICAL STATE CONCERN FIELD OFFICE**  
2796 Overseas Highway, Suite 212  
Marathon, FL 33050-2227  
(305) 289-2402

**COMMUNITY PLANNING**  
2555 Shumard Oak  
Boulevard  
Tallahassee, FL 32399-2100  
(850) 488-2356

**EMERGENCY MANAGEMENT**  
2555 Shumard Oak Boulevard  
Tallahassee, FL 32399-2100  
(850) 413-9969

**HOUSING & COMMUNITY DEVELOPMENT**  
2555 Shumard Oak Boulevard  
Tallahassee, FL 32399-2100  
(850) 488-7956

COUNTY: MONROE

MONROE  
SAI-FEMA  
2003-1204

DATE: 2/3/03

COMMENTS DUE DATE: 3/9/03

CLEARANCE DUE DATE: 4/4/03

SAI#: FL200302073392C

STATE AGENCIES

WATER MNGMNT. DISTRICTS

OPB POLICY UNITS

COMMUNITY AFFAIRS  
FISH and WILDLIFE COMMISSION  
HEALTH  
X STATE  
TRANSPORTATION  
ENVIRONMENTAL PROTECTION

SOUTH FLORIDA WMD

03-1737(surrev)  
AMS C&S

ENVIRONMENTAL POLICY UNIT

The attached document requires a Coastal Zone Management Act/Florida Coastal Management Program consistency evaluation and is categorized as one of the following:

— Federal Assistance to State or Local Government (15 CFR 930, Subpart F). Agencies are required to evaluate the consistency of the activity.

X Direct Federal Activity (15 CFR 930, Subpart C). Federal Agencies are required to furnish a consistency determination for the State's concurrence or objection.

— Outer Continental Shelf Exploration, Development or Production Activities (15 CFR 930, Subpart E). Operators are required to provide a consistency certification for state concurrence/objection.

— Federal Licensing or Permitting Activity (15 CFR 930, Subpart D). Such projects will only be evaluated for consistency when there is not an analogous state license or permit.

Project Description:

Federal Emergency Management Agency - Notice of Draft Supplemental Environmental Assessment (SEA) for the Plantation Key Colony/North Plantation Key Wastewater System - Monroe County, Florida.

RECEIVED

MAR 26 2003

OIP/OLGA

To: Florida State Clearinghouse

EO. 12372/NEPA

Federal Consistency

AGENCY CONTACT AND COORDINATOR (SCH)

2555 SHUMARD OAK BLVD

TALLAHASSEE, FLORIDA 32399-2100

(850) 414-6580 (SC 994-6580)

(850) 414-0479

☒ No Comment

☐ Comment Attached

☐ Not Applicable

☒ No Comment/Consistent

☐ Consistent/Comments Attached

☐ Inconsistent/Comments Attached

☐ Not Applicable

From:

Division of Historical Resources

Division/Bureau: Bureau of Historic Preservation

Reviewer: SARAH JALVING

Frederick P. Garber

Date: 3/21/03

Deputy SHPO

3/21/03

03 FEB 12 AM 10:15

RECEIVED  
BUREAU OF  
HISTORIC PRESERVATION

COUNTY: MONROE

DATE: 2/3/03

COMMENTS DUE DATE: 3/9/03

CLEARANCE DUE DATE: 4/4/03

SAI#: FL200302073392C

Message:

BH

STATE AGENCIES

WATER MNGMNT. DISTRICTS

OPB POLICY UNITS

COMMUNITY AFFAIRS  
FISH and WILDLIFE COMMISSION  
X HEALTH  
STATE  
TRANSPORTATION  
ENVIRONMENTAL PROTECTION

SOUTH FLORIDA WMD

ENVIRONMENTAL POLICY UNIT

The attached document requires a Coastal Zone Management Act/Florida Coastal Management Program consistency evaluation and is categorized as one of the following:

- Federal Assistance to State or Local Government (15 CFR 930, Subpart F). Agencies are required to evaluate the consistency of the activity.
- X Direct Federal Activity (15 CFR 930, Subpart C). Federal Agencies are required to furnish a consistency determination for the State's concurrence or objection.
- Outer Continental Shelf Exploration, Development or Production Activities (15 CFR 930, Subpart E). Operators are required to provide a consistency certification for state concurrence/objection.
- Federal Licensing or Permitting Activity (15 CFR 930, Subpart D). Such projects will only be evaluated for consistency when there is not an analogous state license or permit.

Project Description:

Federal Emergency Management Agency - Notice of Draft Supplemental Environmental Assessment (SEA) for the Plantation Key Colony/North Plantation Key Wastewater System - Monroe County, Florida.

RECEIVED

MAR 05 2003

OIP/OLGA

To: Florida State Clearinghouse

EO. 12372/NEPA

Federal Consistency

AGENCY CONTACT AND COORDINATOR (SCH)

2555 SHUMARD OAK BLVD

TALLAHASSEE, FLORIDA 32399-2100

(850) 414-6580 (SC 994-6580)

(850) 414-0479

- ☐ No Comment
- ☐ Comment Attached
- ☐ Not Applicable

- ☒ No Comment/Consistent
- ☐ Consistent/Comments Attached
- ☐ Inconsistent/Comments Attached
- ☐ Not Applicable

From:

Division/Bureau: HSES Onsite Sewage Programs

Reviewer: Dale Holcomb

Date: 3-4-2003

RECEIVED

FEB 12 2003

BUREAU OF  
ONSITE SEWAGE  
PROGRAMS



Gerald\_Briggs@doh.state.fl.us

03/12/2003 09:10 AM

To: laura\_j\_cherney@urscorp.com  
cc:

Subject: SEA for Plantation Key Colony/North Plantation Key Wastewater System, Monroe County, Florida

*I have reviewed the referenced document and have no suggested comments or changes.*

*Gerald R. Briggs, Chief  
Bureau of Onsite Sewage Programs  
Florida Department of Health*

*FDOH Mission: To promote and protect the health and safety of all people in Florida through the delivery of quality public health services*

*and promotion of health care standards. The bureau supports this mission by developing and promoting a comprehensive onsite sewage program.*

*Please note: Florida has a very broad public records law. Most written communications to or from state officials regarding state business*

*are public records available to the public and media upon request. Your e-mail communications may therefore be subject to public disclosure.*





January 31, 2003

Heinz J. Mueller, Chief  
U.S. Environmental Protection Agency, Region 4  
Office of Environmental Assessment  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, GA 30303

**Subject: Notice of Draft Supplemental Environmental Assessment (SEA) for  
the Plantation Key Colony/North Plantation Key Wastewater System,  
Monroe County, Florida.**

Dear Mr. Mueller:

This purpose of this letter is to provide your agency with notice that URS Corporation, on behalf of the Federal Emergency Management Agency (FEMA), is preparing a Draft Supplemental Environmental Assessment (SEA) for the Plantation Key Colony/North Plantation Key Wastewater System, Monroe County, Florida. The Draft SEA evaluates several wastewater management alternatives proposed for Plantation Key Colony/North Plantation Key, and the potential environmental consequences associated with those alternatives. At this time, FEMA requests your comments regarding the range of alternatives (attached).

In 1998, during the aftermath of Hurricane Georges, Congress allocated additional monies for long-term disaster recovery projects in the State of Florida to assist counties whose needs were yet unmet through allocation of primary disaster relief funds. This Unmet Needs money was earmarked for the counties most impacted by Hurricane Georges, including Monroe County. Monroe County requested that wastewater management improvement projects be considered for disaster funding since many existing wastewater facilities do not provide adequate collection, treatment, or disposal, and thus contribute to degrading water quality in the Florida Keys. Since then, FEMA has received a grant application from the Florida Keys Aqueduct Authority requesting Federal assistance to upgrade the current wastewater treatment facilities on Plantation Key Colony/North Plantation Key.

The National Environmental Policy Act of 1969 (NEPA), the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR Parts 1500 through 1508), and FEMA regulations for NEPA compliance (44 CFR Part 10) direct FEMA and other Federal agencies to fully understand and take into consideration during decision making,

URS Corporation  
Eastern Financial Building, Suite 1000  
700 South Royal Poinciana Boulevard  
Miami Springs, FL 33166  
Tel: 305.884.8900  
Fax: 305.884.2665

the environmental consequences of proposed Federal actions (projects). Therefore, FEMA must comply with NEPA, and other applicable Federal laws and regulations, before making Federal funds available for any disaster recovery and mitigation actions. A Programmatic Environmental Assessment (PEA) for Wastewater Management Improvements in the Florida Keys was prepared in accordance with these regulations, and provides a framework to address impacts of a range of wastewater treatment projects in the Florida Keys. In accordance with 40 CFR Part 1508.28, the Draft SEA for Plantation Key Colony/North Plantation Key tiers from the PEA, and addresses issues specific to this project location.

Please submit your comments to me, in writing, at the contact information listed below within 30 days receipt of this notice.

Laura J. Cherney  
URS Corporation  
700 South Royal Poinciana Blvd., Suite 1000  
Miami Springs, Florida 33166  
Fax: (305) 884-2665  
Email: [laura\\_j\\_cherney@urscorp.com](mailto:laura_j_cherney@urscorp.com)

Your comments will be considered during the Draft SEA preparation process. Thank you for your involvement in this documentation process.

Sincerely,  
**URS Corporation**



Laura J. Cherney  
Project Environmental Scientist

Attachment

Cc: Science Kilner, FEMA Region IV, Lead Environmental Specialist  
Jon Randall, URS Corporation, Environmental Planner

recvd  
2/13/03



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

FEB 10 2003

Laura J. Cherney  
URS Corporation  
700 South Royal Blvd., Suite 1000  
Miami Springs, FL 333166

Subj: Draft Supplemental Environmental Assessment (SEA) for the Plantation Key  
Colony/North Plantation Key Wastewater Treatment System, Monroe County, Florida

Dear Ms. Cherney:

Federal Emergency Management Agency (FEMA) has prepared a draft supplemental environmental assessment (draft SEA) that described a proposed wastewater collection and treatment system for the Village of Islamorada located on Plantation Key in Monroe County, Florida. The Plantation Key Colony/North Plantation Key Wastewater Treatment System SEA describes a Preferred Alternative, an Action Alternative, and a "No Action" alternative, for wastewater improvements within its service area. The Preferred Alternative and the Action Alternative are essentially the same except for the location of the treatment plant facility. The proposed wastewater collection and treatment system will treat an estimated flow of 70,420 gallons per day (gpd). Because of the lack of topographical relief on Plantation Key, a vacuum flow system will be required to convey sewage flows to the wastewater treatment plant; after treatment, the effluent will be disposed by Class V injection wells. Because federal assistance is being provided through FEMA, National Environmental Policy Act (NEPA) documentation of project impacts on the environment is required. The following comments and suggestions might improve the final SEA.

Wastewater flow from the Islamorada community was estimated to be 70,420 gpd, however, the design capacity of the treatment system was not stated. What is the maximum capacity of the proposed treatment system, and how much extra capacity will be built into the system to accommodate anticipated growth? Will the new treatment system induce more growth on Plantation Key with its fragile ecosystem? How much growth is anticipated?

Some clarification of the text is requested in Section 1.2.2.3.1 Collection System. Stated on page 4, 2<sup>nd</sup> paragraph... "Wastewater flow would be conveyed from houses and business via gravity lines to a vacuum pit or collection sump located in the *middle* (emphasis added) of the roadways within the service area." However, we find in the third paragraph, page 4, the statements... "The gravity lines would consist of PVC pipes and terminate in the right-of-way (ROW) line. Connection to the collection system would be the responsibility of the individual property owner and would not require any special plumbing fixtures or electrical connections."

Our reading raises several questions that might be clarified to avoid confusion to other reviewers and the public.

1) Is the statement that the vacuum pits are to be located in the “middle of the roadway” correct? If connection to the vacuum collection system is the responsibility of the homeowner, this implies that the homeowner is responsible for digging up the roadway to make the connection to the vacuum pit. The final SEA should clarify if the location of the vacuum pits would result in any additional costs being directed to the homeowners/business owners in order to connect to the vacuum sewer system.

2) The statement... “The gravity lines would consist of PVC pipes and terminate in the right-of-way (ROW) line.” ...raises a similar question of who is responsible for the installation/maintenance of the lateral segment from the edge of the road ROW to the vacuum pit situated in the middle of the roadway. The final SEA should clarify the party responsible for the installation/maintenance of the connections between the edge of the ROW and the vacuum pits.

Under 1.2.2.7 Operation and Maintenance - The draft SEA did not contain any operating and maintenance costs of the new system to homeowners and businesses. To more fully inform the public of project costs, the final SEA should disclose estimates of annual costs to Islamorada Village residents/business owners for equipment replacement and administrative costs associated with the operating and maintaining this vacuum wastewater collection and treatment system.

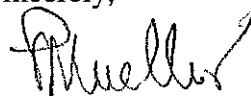
Public Participation - The draft SEA did not contain documentation of public participation such as town meetings and/or public hearings held by the Applicant or FEMA to record and consider comments from the public on the merits of the project. There is no documentation on public opinions/opposition, if any, to the project, or what steps were taken to address concerns/opposition, if any. The final SEA should provide documentation of a public participation process in this project, as is required by NEPA.

Protected Species - The Draft SEA did not indicate if construction of the wastewater treatment plant would impact any federally-listed threatened or endangered plant or animal species and their habitats. EPA encourages the project Applicant and FEMA to consult with the U.S. Fish and Wildlife Service (FWS) to determine what endangered species may be present on the proposed project site(s), and if any avoidance or mitigation strategies may be necessary to fully protect listed threatened and endangered species. FWS has a consultation process under Section 7 of the ESA that may protect FEMA and project Applicants from liability under the Endangered Species Act in the event protected species/habitats are disturbed.

Additional Editorial Comments - The "SEA" acronym on Page 1 was not defined; also Figure 2-2, referenced on Page 4, 2<sup>nd</sup> paragraph, line 3, should be Figure 1-2.

In summary, EPA supports FEMA's Preferred Alternative or the Action Alternative, requests clarification on the system costs to the individual homeowner and business, suggests that FEMA consult with FWS over potential ESA issues, and include project public participation in the final SEA. Thank you for the chance to review the document. If you have questions or need additional information, please contact John Hamilton at (404) 562-9617.

Sincerely,

A handwritten signature in black ink, appearing to read "H. Mueller", with a stylized flourish at the end.

Heinz J. Mueller, Chief  
Office of Environmental Assessment



February 26, 2003

Janet Snyder Matthews, Ph.D., SHPO  
Review and Compliance Section  
Division of Historical Resources  
R.A. Gray Building, Room 305  
500 South Bronough Street  
Tallahassee, FL 32399-0250

**Subject:**     **Draft Report: *Cultural Resources Assessment, Village of Islamorada, Plantation Key/North Plantation Key, Wastewater Treatment Plant, Florida Keys, Florida.***

Dear Dr. Mathews:

On behalf of the Federal Emergency Management Agency (FEMA) Region IV, URS Group, Inc., submits one copy of the above referenced draft report for your review. The report has been prepared in accordance with applicable state and federal standards by investigators who meet the *Secretary of Interior's Professional Qualification Standards* (36 CFR 61) for the discipline of archaeology. As a federal undertaking, the proposed wastewater treatment system for the Village of Islamorada must comply with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, 36 Code of Federal Regulations (CFR) Part 800: Protection of Historic Properties. The purpose of this assessment is to assist FEMA's project planning, to ensure compliance with the National Environmental Policy Act (NEPA) and the NHPA, and to provide the Florida State Historic Preservation Office (SHPO) with information on possible impacts to cultural resources.

This assessment was completed in August 2002 by URS Group, Inc., and consisted of research at the Florida Master Site File system in the SHPO and a pedestrian survey of two proposed project areas. No below ground and no above ground cultural resources were identified within any of the project areas. However, one prehistoric terrestrial archaeological site, one historic terrestrial archaeological site were recorded within a one mile radius of both project areas. These resources will not be affected by the proposed action. Based on these observations, the report finds that the proposed wastewater treatment plant will have no effect on cultural resources in the each project's Area of Potential Effects. Based on the assessment as stated above FEMA has determined that no historic properties will be affected. In accordance with 36 CFR 800.4(d)(1), FEMA requests your concurrence with our determination of "no historic properties affected."

\_\_\_\_\_ Concur with FEMA's findings of "no historic properties affected."



Janet Snyder Matthews, Ph.D.  
Division of Historical Resources  
February 26, 2003  
Page 2

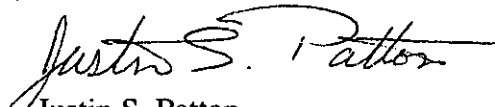
We look forward to receiving any comments you have on the draft report. Please submit your comments to me, in writing, at the contact information listed below within 30 days receipt of this notice.

Justin S. Patton  
URS Group, Inc.  
200 Orchard Ridge Drive, Suite 101  
Gaithersburg, Maryland 20878  
Fax: (301) 656.8059  
Email: justin\_patton@urscorp.com

If we have not received your concurrence or comments within 30 calendar dates (March 19, 2003), FEMA will assume that the SHPO concurs with our findings. Concurrence from SHPO implies that they have no concern with respect to the historic properties subject to Section 106 review. If you have any questions, please contact me at 301-652-2215 ex. 228.

Sincerely,

URS Group, Inc.



Justin S. Patton  
Archaeologist

Attachment

cc: Science Kilner, FEMA Region IV, Lead Environmental Specialist  
Jon Randall, URS Group, Inc., Environmental Planner  
Laura J. Cherney, URS Group, Inc., Project Environmental Scientist



FLORIDA DEPARTMENT OF STATE  
Glenda E. Hood  
Secretary of State  
DIVISION OF HISTORICAL RESOURCES

Mr. Justin Patton  
URS Group, Inc.  
200 Orchard Ridge Drive  
Suite 101  
Gaithersburg, Maryland 20878

March 13, 2003

Re: DHR No. 2003-1737 / Date Received by DHR: February 28, 2003  
Draft Report: *Cultural Resources Assessment, Village of Islamorada, Plantation Key/North Plantation Key, Wastewater Treatment Plant, Florida Keys, Monroe County, Florida*

Dear Mr. Patton:

Our office received and reviewed the above-referenced project in accordance with Section 106 of the *National Historic Preservation Act of 1966* (Public Law 89-665), as amended in 1992, and *36 CFR Part 800: Protection of Historic Properties*; as well as, Chapters 267, *Florida Statutes*, Florida's Coastal Management Program, and implementing state regulations, for possible impact to historic properties listed, or eligible for listing, in the *National Register of Historic Places (NRHP)*, or otherwise of historical, architectural or archaeological value. The State Historic Preservation Officer is to advise Federal agencies as they identify historic properties (listed or eligible for listing, in the *NRHP*), assess effects upon them, and consider alternatives to avoid or minimize adverse effects.

It is the determination of this office that the submitted report is complete. However, in order for the final report to be considered sufficient based on the criteria specified in Chapter 1A-46.001(2), *Florida Administrative Code*, the following information must be forwarded to this office:

- Pertinent historical data from records such as plat maps, tract books, subdivision maps, Sanborn maps, city directories, building permits and architectural plans.
- Pertinent information from informants, which shall include the Certified Local Government within whose boundaries the project lies (make a negative statement if none were identified).
- Rational for fieldwork methodology (explain why no subsurface survey was conducted and address any portions of the project area that were not subject to survey).
- Curation location for project records (including field notes and photographs).
- Procedures to deal with unexpected discoveries including the discovery of human remains in accordance with chapter 872.05, *Florida Statutes*.

The requested information should be identified as a revised final report, and include the above DHR Number. When this addendum is received, we can quickly complete the review process. Please note that the complete language of Chapter 1A-46 is available online at <http://dhr.dos.state.fl.us/bhp/compliance>. Otherwise, we will forward a copy of this document at your request.

500 S. Bronough Street • Tallahassee, FL 32399-0250 • <http://www.flheritage.com>

☐ Director's Office  
(850) 245-6300 • FAX: 245-6435

☐ Archaeological Research  
(850) 245-6444 • FAX: 245-6436

☒ Historic Preservation  
(850) 245-6333 • FAX: 245-6437

☐ Historical Museums  
(850) 245-6400 • FAX: 245-6433

☐ Palm Beach Regional Office  
(561) 279-1475 • FAX: 279-1476

☐ St. Augustine Regional Office  
(904) 825-5045 • FAX: 825-5044

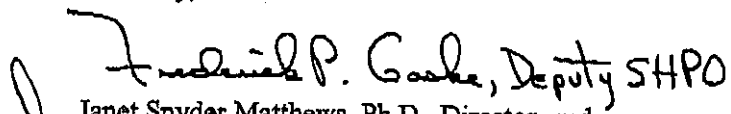
☐ Tampa Regional Office  
(813) 272-3843 • FAX: 272-2340



Mr. Patton  
March 13, 2003  
Page 2

If you have any questions concerning our comments, please contact Alissa Slade, Historic Sites Specialist, at [amslade@mail.dos.state.fl.us](mailto:amslade@mail.dos.state.fl.us) or (850) 245-6333. Your interest in protecting Florida's historic properties is appreciated.

Sincerely,

  
Janet Snyder Matthews, Ph.D., Director, and  
State Historic Preservation Officer



## FLORIDA DEPARTMENT OF STATE

Glenda E. Hood

Secretary of State

DIVISION OF HISTORICAL RESOURCES

Mr. Justin Patton  
URS Group, Inc.  
200 Orchard Ridge Drive  
Suite 101  
Gaithersburg, Maryland 20878

May 8, 2003

Re: DHR No. 2003-01737B / Date Received by DHR: May 8, 2003 *AK 5/9/03*  
Revised Report: *Cultural Resources Assessment, Village of Islamorada, Plantation*  
*Key/North Plantation Key, Wastewater Treatment Plant, Florida Keys,*  
*Monroe County, Florida*

Dear Mr. Patton:

Our office received and reviewed the above-referenced project in accordance with Section 106 of the *National Historic Preservation Act of 1966* (Public Law 89-665), as amended in 1992, and 36 *CFR Part 800: Protection of Historic Properties*; as well as, Chapters 267, *Florida Statutes*, Florida's Coastal Management Program, and implementing state regulations, for possible impact to historic properties listed, or eligible for listing, in the *National Register of Historic Places (NRHP)*, or otherwise of historical, architectural or archaeological value. The State Historic Preservation Officer is to advise Federal agencies as they identify historic properties (listed or eligible for listing, in the *NRHP*), assess effects upon them, and consider alternatives to avoid or minimize adverse effects.

Survey results indicate that no archaeological or historic sites were identified in Project Areas 1 and 2. It is the opinion of URS Group, Inc., that the proposed wastewater treatment improvements will have no effect on any historic properties eligible for listing in the *National Register of Historic Places*, or otherwise of historical or archaeological value. Based on the information provided, this agency concurs with this determination and finds the submitted report complete and sufficient in accordance with Chapter 1A-46, *Florida Administrative Code*.

If you have any questions concerning our comments, please contact Alissa Slade, Historic Sites Specialist, at [amslade@dos.state.fl.us](mailto:amslade@dos.state.fl.us) or (850) 245-6333. Your interest in protecting Florida's historic properties is appreciated.

Sincerely,

*Janet Snyder Matthews, Ph.D., Director, and*  
*State Historic Preservation Officer*

500 S. Bronough Street • Tallahassee, FL 32399-0250 • <http://www.flheritage.com>

☐ Director's Office  
(850) 245-6300 • FAX: 245-6435

☐ Archaeological Research  
(850) 245-6444 • FAX: 245-6436

☒ Historic Preservation  
(850) 245-6333 • FAX: 245-6437

☐ Historical Museums  
(850) 245-6400 • FAX: 245-6433

☐ Palm Beach Regional Office  
(561) 279-1475 • FAX: 279-1476

☐ St. Augustine Regional Office  
(904) 825-5045 • FAX: 825-5044

☐ Tampa Regional Office  
(813) 272-3843 • FAX: 272-2340